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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2011 Grand Jury

UNITED STATES OF AMERICA,) Case No. **12 CR 3617 CAB**
)
Plaintiff,) I N D I C T M E N T
)
v.) Title 18, U.S.C., Sec. 1591(a)
) and (b) - Sex Trafficking of
ISSAC SYMEON BRAGG,) Children; Title 18, U.S.C.,
) Sec. 2251 - Sexual Exploitation of
aka "Tony Jones",) a Child; Title 18, U.S.C.,
aka "blackmagicmoney70",) Sec. 2 - Aiding and Abetting;
Defendant.) Title 18, U.S.C., Secs. 1594(d)
) and 2253 - Criminal Forfeiture

The grand jury charges:

Count 1

On or about and between April 1, 2010 and May 6, 2010, within the Southern District of California, defendant ISSAC SYMEON BRAGG, aka "Tony Jones", aka " blackmagicmoney70", in and affecting interstate commerce, knowingly did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: Minor Female #1, knowing and in reckless disregard of the fact that Minor Female #1 would be caused to engage in a commercial sex act, having had a reasonable opportunity to observe Minor Female #1 and knowing and in reckless disregard of the fact that Minor Female #1 had not attained the age of 18 years; in violation of Title 18, United States Code, Section 1591(a) and (b); and Title 18, United States Code, Section 2.

APS:vp:San Diego
8/27/12

Count 2

On or about April 7, 2010, within the Southern District of California, defendant ISSAC SYMEON BRAGG, aka "Tony Jones", aka "blackmagicmoney70", did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transmitted and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and was produced using materials that had been mailed, shipped, and transported in or affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e); and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1-2 of this Indictment are realleged and by reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1594(d) and 2253.

2. Upon conviction of the offenses alleged in Counts 1-2, which involve violations of Title 18, United States Code, Section 1591(a) (sex trafficking of children) and Section 2251 (sexual exploitation of a minor), defendant ISSAC SYMEON BRAGG, aka "Tony Jones", aka "blackmagicmoney70", shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 1594(d) and 2253(a), all right, title and interest in: (1) any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; (2) any property, real or personal,

1 constituting or derived from, any proceeds obtained, directly or
2 indirectly, as a result of the offense; and (3) all visual depictions
3 described in Section 2251. The property to be forfeited includes, but
4 is not limited to, the following:

- 5 a. One Samsung Model R450 cellphone;
- 6 b. Sexually explicit images of minors.


7 3. If any of the forfeitable property described above in
8 Paragraph 2, as a result of any act or omission of the defendant -

- 9 (a) cannot be located upon the exercise of due diligence;
- 10 (b) has been transferred or sold to, or deposited with, a
11 third party;
- 12 (c) has been placed beyond the jurisdiction of the Court;
- 13 (d) has been substantially diminished in value; or
- 14 (e) has been commingled with other property which cannot
15 be subdivided without difficulty; it is the intent of the United
16 States, pursuant to Title 18, United States Code, Section 2253(b)
17 which incorporates Title 21, United States Code, Section 853(p), to
18 seek forfeiture of any other property of the defendant up to the value
19 of the forfeitable property described above in Paragraph 2.

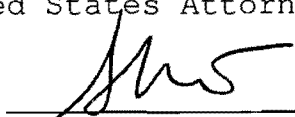
20 All pursuant to Title 18, United States Code, Sections 1594(d) and
21 2253.

22 DATED: August 29, 2012.

23 A TRUE BILL:

24 
25 Foreperson

26 LAURA E. DUFFY
27 United States Attorney

28 By: 
ALESSANDRA P. SERANO
Assistant U.S. Attorney